

ANDRES GOMEZ

1 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
2 **IN AND FOR THE COUNTY OF LOS ANGELES**

3

4 **ANDRES GOMEZ,**5 **Plaintiff,**6 **vs.**

NO. 12STCV17753

7 **ASLAN CATERING, INC.,**8 **Defendants.**

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11 **DEPOSITION OF ANDRES GOMEZ**12 **APPEARING REMOTELY FROM**13 **MIAMI, FLORIDA**

14

JULY 9, 2021

15

10:03 A.M.

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22 **REPORTED BY:**23 **Celeste J. Silva**24 **CSR No. 10179**25 **APPEARING REMOTELY FROM TULARE COUNTY, CALIFORNIA****EXHIBIT A**

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1 REMOTE APPEARANCES:**2****3 For the Plaintiff:****4 POTTER HANDY****5 BRAD SMITH, ESQ.****6 8033 Linda Vista Road, Suite 200****7 San Diego, California 92111****8 (858)375-7385****9 russ@potterhandy.com****10****11****12 For the Defendant:****13****14****15 SAHELIAN LAW OFFICES****16 ARA SAHELIAN, ESQ.****17 23276 South Pointe Drive, Suite 216****18 Laguna Hills, California 92653****19 (949)859-9200****20 sahelianlaw@me.com****21****22****23****24****25**

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1 REPORTED REMOTELY FROM TULARE COUNTY, CALIFORNIA

2 JULY 9, 2021

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4 ANDRES GOMEZ

5 having been first duly sworn, testifies as follows:

6

7 EXAMINATION

8 BY MR. SAHELIAN:

9 Q Mr. Gomez, good morning.

10 A Good morning.

11 Q Are what time is it in Florida right now?

12 A 1 p.m.

13 Q All right. Have you had your deposition taken
14 previously?

15 A I have, yes.

16 Q How many times?

17 A I believe around four times.

18 Q What city was each taken in?

19 A They were all in Florida -- oh, I'm sorry, I
20 believe one in California as well.

21 Q When was the one in California taken?

22 A I believe 2015.

23 Q And what was that in relation to?

24 A An ADA case.

25 Q What were the issues in this case, factual

1 (A recess was taken.)

2 BY MR. SAHELIAN:

3 Q Okay. As we speak today, are you employed?

4 A No, I'm not.

5 Q When was the last time you held a job?

6 A The last time I held a job was the factory I
7 had mentioned, factory job I had.

8 Q Okay. And what year was that again?

9 A 2010, around '10 or '9.

10 Q Okay. How do you pay the bills without a job?

11 A I was receiving Social Security disability and
12 SSI as well.

13 Q When did you begin receiving --

14 A I started receiving it around 2000 -- I believe
15 2011.

16 Q Do you live by yourself?

17 A No, I do not.

18 Q Who do you live with?

19 A My girlfriend.

20 Q What's her name?

21 A Leslie Salazar.

22 Q And that's in Miami?

23 A That's correct.

24 Q Okay. Does the Social Security disability also
25 provide medical insurance?

1 Q All right. When was your last trip to
2 California?

3 A March of 2021.

4 Q March of 2020?

5 A 2021, this year.

6 Q How long did you stay in California?

7 A I was there for two months.

8 Q Where did you stay?

9 A I stayed at my aunt's house.

10 Q And what was her -- strike that.

11 What city was she in?

12 A El Monte, California. It's E-L M-O-N-T --
13 M-O-N-T-E, El Monte, California.

14 Q All right. So you went to the airport sometime
15 in March in Miami I'm assuming, correct?

16 A No.

17 Q Did you drive out?

18 A Yeah, we did a road trip.

19 Q Okay. And who drove?

20 A My girlfriend.

21 Q All right. How long did it take you to drive
22 out here?

23 A Three days.

24 Q 30 days?

25 A Three.

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1 A Yes, of course, yes, I do.

2 Q Okay. When do you plan to come back?

3 A I plan to come back in the next -- in a couple
4 of months, maybe three to four months.

5 Q What would the purpose be?

6 A The purpose is to visit family. I have 40
7 family members that live all over California.

8 Q Okay. Do you plan to come out here again
9 having your girlfriend drive you?

10 A I don't know. That's a good question. Maybe.
11 I'm not sure.

12 Q If your girlfriend is employed and cannot drive
13 you here, how do you plan on coming out here?

14 A I would go with a family member or a friend.

15 Q Meaning drive?

16 A No, not necessarily. We can either even -- we
17 can just take a plane or we can take a train.

18 Q All right. Do you have a fear of flying?

19 A No, I don't, no.

20 Q Do you enjoy flying?

21 A It's not bad, yeah.

22 Q Okay. Is there any reason why you don't fly
23 out to California?

24 A I have.

25 Q Okay. When is the last time you flew out?

07/09/2021

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SIMPSON DEPOSITION SERVICES (800) 505-9994

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1 STATE OF CALIFORNIA)
2 COUNTY OF TULARE) ss.
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4 I, CELESTE SILVA, a Certified Shorthand
5 Reporter of the State of California, do hereby
6 certify:

7 That prior to being examined, the witness
8 in the foregoing proceedings was by me duly sworn to
9 testify to the truth, the whole truth and nothing
10 but the truth;

11 That said proceedings were taken remotely
12 before me at the time and place therein set forth
13 and were take down by me in shorthand and thereafter
14 transcribed into typewriting under my direction and
15 supervision;

16 I further certify that I am neither
17 counsel for, nor related to, any parties to said
18 proceedings, nor in anyway interested in the outcome
19 thereof.

20 In witness whereof, I have hereunto
21 subscribed my name.

22

23 DATED: July 26, 2021

24 Celeste Silva

25 CELESTE SILVA, CSR 10179